

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: ) Bankr. No. 25-20026 CMB  
JOHN D. NAPPER, )  
Debtor. ) Chapter 13  
KEY BANK, ) Docket No. 37  
Movant, ) Related to Docket No. 30  
vs. )  
JOHN D. NAPPER AND ) Hearing Date & Time:  
RONDA J. WINNECOUR, )  
CHAPTER 13 TRUSTEE, )  
Respondents. ) Claim No. 9

**DECLARATION OF MORTGAGE PAYMENT CHANGE**

And Now, comes the Debtor, John D. Napper, by and through his attorney, who respectfully represents the following:

1. On or about January 5, 2025, Debtor filed a Bankruptcy under Chapter 13 of the U.S. Bankruptcy Code.
2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
3. Key Bank has filed a Notice of Mortgage Payment Change.  
(a) The monthly mortgage payment of **\$118.92** is being **increased to \$126.12** effective **5/15/2025**.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment according to the above referenced Notice of Mortgage Payment Change commencing with the next distribution in the effective amount

Respectfully submitted.

Date:5/9/2025

/s/ Rodney D. Shepherd

Rodney D. Shepherd, Esquire  
Attorney for the Debtor  
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**CERTIFICATE OF SERVICE**

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 9<sup>th</sup> day of May, 2025, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire  
Chapter 13 Trustee  
[cmecl@chapter13trusteewdpa.com](mailto:cmecl@chapter13trusteewdpa.com)

Key Bank  
Attn: Brent J. Lemon, Esquire  
[bblemon@kmllawgroup.com](mailto:bblemon@kmllawgroup.com)

By: /s/ Rodney D. Shepherd  
Rodney D. Shepherd  
Attorney for the Debtor  
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